

Remarks

The instant Office Action dated July 23, 2008 lists the following rejections: claim 14 stands rejected under 35 U.S.C. §112(1); claims 1-3, 5-7 and 9-12 stand rejected under 35 U.S.C. § 103(a) over the He reference (U.S. Patent No. 6,323,849) in view of the Duwaer reference (U.S. Patent No. 4,922,240); and claims 4, 8 and 13 stand rejected under 35 U.S.C. §103(a) over He and Duwaer in further view of the Sarrasin reference (U.S. Patent No. 5,600,343). Applicant respectfully traverses these rejections. In the discussion set forth below, Applicant does not acquiesce to any rejection or averment in this Office Action unless Applicant expressly indicates otherwise.

The §112(1) rejection of claim 14 is improper because the subject matter recited in claim 14 is described in Applicant's specification in a manner that sufficiently demonstrates to one of skill in the art that Applicant had possession of the invention. For example, Fig. 2 and Paragraph 0029 disclose passing the second control signal (R_P) when not blocked by the first control signal (R_E). Applicant submits that such description is more than sufficient to demonstrate possession of overriding of the second control signal by the first control signal. Applicant points out that, "[t]he written description requirement does not require the applicant 'to describe exactly the subject matter claimed, [instead] the description must clearly allow persons of ordinary skill in the art to recognize that [he or she] invented what is claimed.'" *Union Oil Co. of California v. Atlantic Richfield Co.*, 208 F.3d 989 (Fed. Cir. 2000), *cert. denied*, 69 U.S.L.W. 3165 (Feb. 20, 2001) (No. 00-249) (quoting *In re Gosteli*, 872 F.2d 1008, 1012, 10 U.S.P.Q.2d 1614, 1618 (Fed. Cir. 1989) (citations omitted)).

Moreover, Applicant submits that the §112(1) rejection is based on a mere conclusory statement, and that the examiner has not met the initial burden of establishing that one of ordinary skill in the art would be unable to practice the claimed invention without undue experimentation in light of the specification disclosure and state of the prior art. See *In re Strahilevitz*, 668 F.2d 1229, 1232, 212 USPQ 561, 563 (CCPA 1982); and *In re Armbruster*, 512 F.2d 676, 677, 185 USPQ 152, 153 (CCPA 1975).

For these reasons, Applicant submits that the §112(1) rejection of claim 14 is improper, and requests that it be withdrawn. Applicant further notes that upon withdrawal of the improper §112(1) rejection, claim 14 should be allowed or the finality

of the Office Action withdrawn since no art rejections were made with regard to the subject matter of claim 14.

The § 103(a) rejection of claims 1-3, 5-7 and 9-12 is improper because the proposed combination of He and Duwaer fails to teach or suggest all the features recited in Applicant's claims, and because one of skill in the art would find no valid reason to make the proposed combination.

The Office Action acknowledges that the He reference does not teach a display circuit arrangement that includes a row drive circuit having a logic function connected in front of the row outputs. Instead, the Duwaer reference is relied upon for allegedly disclosing logic connected in front of row outputs in a display driver. It is argued in the Office Action that one of skill in the art would seek to modify the display module disclosed by the He reference by incorporating logic connected in front of row outputs as disclosed by Duwaer. However, the display driving circuit disclosed by Duwaer does not have correspondence to the logic function claimed by Applicant, which includes a control signal that achieves a deactivation/activation of row outputs in dependence on a partial mode driving scheme. Duwaer does not teach a partial mode driving scheme (*i.e.*, where an unneeded portion of the display is deactivated to save power), and there is nothing taught by the cited references (or provided by the Examiner) setting forth whether or how logic applied to the progressive scanning of Duwaer could be incorporated into a partial mode driving scheme. In the absence of such evidence, Applicant submits that the record does not support the Examiner's conclusory statement that logic shown by Duwaer could be used in the display device of He.

Moreover, Applicant submits that incorporating Duwaer's row driver circuitry into the display circuit of He would not provide the partial mode control as recited in Applicant's claims. Duwaer discloses active matrix display addressing where each of the pixels is controlled by separate transistors, the transistors being controlled by row and column driver lines. The logic circuitry shown in Duwaer's Figure 9 controls how the rows are scanned, for example in a progressive or interlaced manner (*see, e.g.*, Col. 8:41-55). Applicant finds nothing in Duwaer to teach or suggest the claimed feature of supplying a control signal to the logic function to activate and deactivate row outputs

based on a partial mode addressing scheme. Applicant therefore submits that the proposed combination does not teach or suggest the claimed invention.

Applicant further submits that one of skill in the art would find no reason to modify the teachings of He in the proposed manner. He already provides a control circuit that controls both the row and the column drivers, and that can be used to turn off unused portions of the display when in a partial display mode (*see, e.g.*, Col. 3:13-15). One of skill in the art would not seek to add additional logic circuitry to the device of He when the functionality allegedly sought to be added is already present. Such redundancy contradicts the reasons proffered by the Office Action for making the combination, namely to produce a system with a more compact size. One of skill in the art would also not seek to modify He by replacing the control circuit with logic circuitry connected in front of the row outputs because the control circuit of He is meant to control both the row drivers and the column drivers. Applicant therefore submits that a valid reason to modify the He reference in the suggested manner has not been presented.

For at least the reasons discussed above, Applicant submits that the § 103(a) rejection of claims 1-3, 5-7 and 9-12 is improper, and requests that the rejection be reconsidered and withdrawn.

The § 103(a) rejection of claims 4, 8 and 13 is predicated on the underlying combination of He and Duwaer as applied to claim 1. The Sarrasin reference is introduced for its alleged disclosure and use of shift registers. Applicant submits that Sarrasin appears to provide no teaching or disclosure that could be used to cure the deficiencies of the underlying combination as discussed above. For at least this reason, Applicant submits that the § 103(a) rejection of claims 4, 8 and 13 is improper, and requests that the rejection be reconsidered and withdrawn.

In view of the remarks above, Applicant believes that each of the rejections has been overcome and the application is in condition for allowance. Should there be any remaining issues that could be readily addressed over the telephone, the Examiner is asked to contact the agent overseeing the application file, Aaron Waxler, of NXP Corporation at (408) 474-9063 (or the undersigned).

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